

TIMOTHY ELDER (CA BAR NO. 277152)
KRISTOPHER A. NELSON (CA BAR NO. 342552)
TRE LEGAL PRACTICE
1155 Market Street, Tenth Floor
San Francisco, CA 94103
Telephone: (415) 873-9199
Facsimile: (415) 952-9898
Email: telder@trelegal.com, knelson@trelegal.com

S. Tomiyo Stoner (CA Bar No. 289246)
Undaunted Law Firm, P.C.
600 California St., Floor 7
San Francisco, CA 94108
Telephone: (214) 415-7340
E-mail: tstoner@undauntedlaw.com

Attorneys for Plaintiff

Kevin E. Gilbert, Esq. (SBN: 209236)
kgilbert@ohhlegal.com
Nicholas D. Fine, Esq. (SBN: 285017)
nfine@ohhlegal.com
ORBACH HUFF + HENDERSON LLP
6200 Stoneridge Mall Road, Suite 225
Pleasanton, CA 94588
Telephone: (510) 999-7908
Facsimile: (510) 999-7918

Attorneys for Defendant

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

LISAMARIA MARTINEZ,

Plaintiff,

v.

COUNTY OF ALAMEDA,

Defendants

Case No. 3:20-cv-06570-TSH

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE ON MOTION
FOR PERMANENT INJUNCTION**

Trial Date: March 26, 2024

Judge: Hon. Thomas S. Hixson

**JOINT STIPULATION REGARDING BRIEFING SCHEDULE ON MOTION FOR
PERMANENT INJUNCTION**

Pursuant to the Court's direction that the parties submit a stipulation for the briefing schedule on Plaintiff's motion concerning whether an injunction should issue, the parties stipulate and agree to the following briefing schedule:

1. Plaintiff's Motion for Permanent Injunction will be due on May 16, 2024 (30 days from today);
2. Defendant's Opposition to Plaintiff's Motion for Permanent Injunction will be due on June 6, 2024 (3 weeks later); and
3. Plaintiff's Reply to Defendant's Opposition to Plaintiff's Motion for Permanent Injunction will be due on June 20, 2024 (2 weeks later).

Defendant's Rule 50 motion will be due in accordance with the statutory deadline of 28 days after entry of the judgment.

DATED: April 16, 2024

Respectfully submitted,
TRE LEGAL PRACTICE

/s/ Timothy Elder
Timothy Elder

Attorneys for Plaintiff

DATED: April 16, 2024

ORBACH HUFF + HENDERSON LLP

/s/ Nicholas D. Fine
Nicholas D. Fine

Attorneys for Defendants